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Attorneys for Defendants

CLUB TVPAD, INC., and BENNETT WONG

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

WESTERN DIVISION

CHINA CENTRAL TELEVISION, a Chinese company; CHINA INTERNATIONAL) Case No. 2:15-cv-01869-MMM-AJW

COMMUNICATIONS CO., LTD., a China) Hon. Margaret M. Morrow

company; TVB HOLDINGS (USA), INC., a)

California corporation; and DISH)

NETWORK L.L.C., a Colorado corporation,) **RESPONSE OF COUNSEL FOR**

Plaintiffs,) **DEFENDANTS CLUB TVPAD,**

v.) **INC. AND BENNETT WONG TO**

) **ORDER TO SHOW CAUSE RE**

) **FAILURE TO APPEAR AT**

) **SCHEDULING CONFERENCE**

CREATE NEW TECHNOLOGY (HK))

LIMITED, a Hong Kong company; HUA)

YANG INTERNATIONAL TECHNOLOGY)

LIMITED, a Hong Kong company;)

SHENZEN GREATVISION NETWORK)

TECHNOLOGY CO. LTD., a China)

company; CLUB TVPAD, INC., a California)

corporation; BENNETT WONG, an)

individual; ASHA MEDIA GROUP INC.)

d/b/a TVPAD.COM, a Florida corporation;)

AMIT BHALLA, an individual;)

NEWTVPAD LTD. COMPANY d/b/a)

RESPONSE OF COUNSEL FOR DEFENDANTS TO ORDER TO SHOW CASE RE FAILURE TO
APPEAR

1 NEWTVPAD.COM a/k/a TVPAD USA, a)
2 Texas corporation; LIANGZHONG ZHOU,)
3 an individual; HONGHUI CHEN d/b/a E-)
4 DIGITAL, an individual; JOHN DOE 1 d/b/a)
5 BETV; JOHN DOE 2 d/b/a YUE HAI; JOHN)
6 DOE 3 d/b/a 516; JOHN DOE 4 d/b/a HITV;)
7 JOHN DOE 5 d/b/a GANG YUE; JOHN)
8 DOE 6 d/b/a SPORT ONLINE; JOHN DOE 7)
9 d/b/a GANG TAI WU XIA; and JOHN DOES)
10 8-10,)

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Defendants.)

1 TO THIS HONORABLE COURT, AND TO ALL PARTIES AND THEIR
2 COUNSEL OF RECORD:

3 PLEASE TAKE NOTICE that counsel for defendants Club TVpad, Inc. and
4 Bennett Wong files this response to an Order to Show Cause re failure to appear at the
5 scheduling conference held on August 31, 2015.

6 The Ryu Law Firm did not make an appearance at the scheduling conference due
7 to the inadvertence of lead counsel, Francis S. Ryu.

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9 Respectfully submitted,
10 Dated: September 9, 2015 **RYU LAW FIRM**

11
12 By: /s/ Francis S. Ryu

13 **FRANCIS S. RYU, ESQ.**
14 **MINDY S. BAE, ESQ.**
15 Attorneys for Defendants
16 CLUB TVPAD, INC. and
17 BENNETT WONG
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DECLARATION OF FRANCIS S. RYU

I, Francis S. Ryu, hereby declare:

1. I am a principal at Ryu Law Firm, attorneys of record for defendant Club TVpad, Inc. and Bennett Wong. The facts set forth herein are within my personal knowledge, and if sworn as a witness, I could and would testify competently thereto under oath.

2. The Ryu Law Firm did not make an appearance at the scheduling conference on August 31, 2015 at 9:00 a.m. due to my inadvertence. The Scheduling Conference was added as an entry in the law firm's calendar. However, I overlooked the entry and was not aware of the Scheduling Conference until I came into the office at 9:30 a.m. that morning. I take full responsibility for this inadvertence and apologize to this Court and to all counsel for my absence.

I declare under the penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed at Los Angeles, California on this 9th day of September 2015.

/s/ Francis S. Ryu

FRANCIS S. RYU

CERTIFICATE OF SERVICE

I hereby certify that on September 9, 2015, I electronically filed the foregoing
**RESPONSE OF COUNSEL FOR DEFENDANTS CLUB TVPAD INC. AND
BENNETT WONG TO ORDER TO SHOW CAUSE RE FAILURE TO APPEAR
AT SCHEDULING CONFERENCE ON AUGUST 31, 2015** with the Clerk of the
Court using the CM/ECF system which will send notification of such filing via
electronic mail to all counsel of record.

/s/ Francis S. Ryu

FRANCIS S. RYU